

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

E.K. and S.K., minors, by and through their parent and next friend LINDSEY KEELEY; O.H., S.H., and H.H., minors, by and through their parent and next friend JESSICA HENNINGER; E.G., a minor, by and through his parent and next friend MEGAN JEBELES; E.Y. and C.Y., minors, by and through their parent and next friend ANNA YOUNG; L.K., L.K., and L.K., minors, by and through their parent and next friend ANNA KENKEL; and M.T., a minor, by and through her parent and next friend NATALIE TOLLEY,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE
EDUCATION ACTIVITY; DR. BETH
SCHIAVINO-NARVAEZ, in her official
capacity as Director of the Department of
Defense Education Activity; and PETER
BRIAN HEGSETH, in his official capacity as
Secretary of Defense,

Defendants.

Case No. 1:25-cv-00637-PTG-IDD

Hon. Patricia Tolliver Giles

**DECLARATION OF LINDSEY KEELEY IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Lindsey Keeley, declare as follows,

1. I am more than 18 years old, competent to be a witness, and the facts set forth in this declaration are based on my own personal knowledge.
2. I am married to an active-duty service member stationed in Quantico, Virginia. I am employed as a clinical pharmacist at a hospital in Northern Virginia.

3. My husband and I have been married since 2011. We have been together through five duty stations at various locations across the United States. I have learned from experience that being part of a military family calls for sacrifice. My children and I have endured long separations while my husband has been deployed throughout Europe and the Middle East. These deployments included combat operations against Taliban forces in Afghanistan and against the Islamic State in Iraq and the Levant (ISIL) in Iraq.

4. We have two children. S.K. is in first grade and E.K. is in fourth grade. Both have attended Crossroads Elementary School since August 2023. Crossroads is a Quantico DoD Educational Activity (DoDEA) school in Virginia.

5. We expect our children to be eligible for DoDEA schools through high school, and for our family's relationship with DoDEA schools to continue. My husband recently received accompanied orders overseas where DoDEA schools are the primary available English-language schools. He could serve for an additional ten years at his current rank, meaning that our children could attend DoDEA schools through high school wherever my husband's service takes us.

6. Our family has enjoyed our experience with DoDEA schools. DoDEA schools consistently perform well on National Assessment for Education Progress (NAEP) rankings and metrics, and our experience has been positive. We have had a great rapport with our children's teachers. Student-teacher ratios, teaching methods, and curricular materials have all been excellent for our children.

7. Since President Trump's Executive Orders targeting Diversity, Equity, and Inclusion, however, we have become very concerned with the negative impacts to our children's current and future education in DoDEA schools.

8. S.K. (our first grader) is very creative. She enjoys art and music and loves to illustrate stories. She even creates illustrations of her math problems in the margins of her worksheets. S.K.'s teachers at DoDEA support and encourage her creativity and have been responsive to all of our questions about S.K.'s education needs and learning style in the classroom.

9. E.K. (our fourth grader) is a strong reader, who enjoys socializing. She often talks about the diverse interactions school provides for her. E.K.'s favorite place at school is in the library, where the librarian is E.K.'s former third grade teacher. The librarian fosters E.K.'s love of reading. E.K. especially enjoys checking out and taking home books from the library's student section, which has stories on a wide array of topics.

10. As a child, I attended public schools in a small town in Oklahoma, where my mother taught elementary school for forty years. I have seen recent news reports about the "culture wars" in Oklahoma public schools and its current public-school commissioner, but my experience as a student in the 1990s and early 2000s was very positive. I credit the balanced education I received, including in math and science, with helping me successfully complete my graduate education in pharmacy studies. I was also exposed to viewpoints and experiences that were different from my own, which helped me become a well-rounded student.

11. My husband's education as a child was very different. He was homeschooled in a politically conservative, religious household that followed a 'classical Christian education' model. Expanding the narrow viewpoint this provided has been one of the defining challenges of his adult life, and it is important to us, as parents, that our children be afforded a school experience more similar to mine.

12. My husband's educational experience was very similar to the model Secretary of Defense Pete Hegseth proposes in his 2022 book, *Battle for the American Mind: Uprooting a*

Century of Miseducation. Because my husband grew up in a similar school environment, we know that it is not the kind of academic model we want for our children. We value and respect different viewpoints and do not want our children to attend a school that forces them to accept a single, often religious, orthodoxy. Instead, my husband and I want our children to enjoy an inclusive and science-based education like the one I received. I am deeply concerned DoDEA schools will transform to comply with the education model centered on religion described in Secretary Hegseth's book.

13. While I understand that my spouse, as an active-duty service member, signed away many of his First Amendment rights, our kids should not be treated like second-class citizens. They have the same rights as everyone else, including at school.

14. Earlier this year, the White House issued two Executive Orders that DoDEA has cited as justification for the changes we are starting to see in our school. Those Executive Orders are Order No. 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government; and Order No. 14190, Ending Radical Indoctrination in K-12 Schooling.

15. Additionally, on January 27, 2025, the White House issued Executive Order No. 14185, Restoring America's Fighting Force (collectively, with Executive Orders 14168 and 14190, the "Executive Orders"). Two days later, on January 29, 2025, my husband received an all-hands email attaching a memorandum from Secretary Hegseth. The memorandum, also called "Restoring America's Fighting Force," placed a "[p]rohibition on Instruction on Critical Race Theory, Gender Ideology, and [Diversity, Equity, and Inclusion]," specifically forbidding any DoD element, which includes the DoDEA school my children attend, from providing instruction on these topics.

16. On February 5th, 2025, DoDEA Headquarters directed all schools to immediately remove from use several DoDEA-adopted instructional resources (including curriculum modules and library books) as part of an ongoing compliance review, as set forth in a memorandum. The memorandum included an attachment listing resources for removal and it also mandates educators and school leaders to identify additional materials for removal. The memorandum does not provide a timeline for reviewing materials for compliance, but it is my understanding that students at DoDEA schools will not have access to any of the flagged materials while they are under review. The impact on our children, E.K. and S.K., therefore, will be immediate.

17. On February 7, 2025, additional guidance was issued directing at least one additional DoDEA region—DoDEA Europe, which is where my husband and our family will be stationed beginning this summer—to implement the Executive Orders and the related directives. A true and correct copy of this guidance, obtained pursuant to my family's DoDEA Freedom of Information Act (FOIA) request #25-F-0015, is attached as **Exhibit A**.

18. On February 10, 2025, our family received a letter from DoDEA Director Dr. Beth Schiavano-Narvaez confirming that DoDEA was complying with DoD guidance prohibiting use of official resources to mark cultural awareness months. This was the first time I heard about actual changes taking place at DoDEA schools, including that students' access to certain items was already being restricted. A true and correct copy of Dr. Schiavano-Narvaez's February 10 letter is attached as **Exhibit B**.

19. On February 20, 2025, my husband attended the Quantico School Advisor Council. I wanted to attend but was unable to do so because the meeting took place in the middle of the workday. A true and correct copy of the February 20, 2025, meeting minutes is attached as **Exhibit C**.

20. During the meeting, my husband, in his personal capacity as a parent, asked for clarification about Dr. Schiavano-Narvaez's February 10 letter. Specifically, he asked for a list of titles that had been removed from the library. He also asked for confirmation that DoDEA maintained its academic integrity and independence as the curriculum was brought into compliance with the various executive orders; he posed a specific hypothetical, asking whether DoDEA would have to teach that the world was flat if it had been instructed to do so. Lastly, my husband asked for general transparency as the process unfolded. During that meeting, parents were told that the school could not "celebrate cultural things."

21. The District Superintendent said at the meeting that all communications regarding the items under review would come from DoDEA Headquarters. She also confirmed that there was virtually no academic independence from DoD guidance, even in the case of the hypothetical regarding the flat-world conspiracy theory.

22. We have repeatedly asked DoDEA administrators for updates, beginning on February 11, 2025—just one day after Dr. Schiavano-Narvaez's letter first alerted us that changes were underway. To this day, we have received little-to-no specific information about any actions taken. We are frustrated by the lack of information. More importantly, I am familiar with 10 U.S.C. § 2164a (Rights of Parents in DoDEA Schools). I know that as a DoDEA parent, I have the right to view curriculum standards and to receive advance notification of changes to those standards. Despite this, we are facing an information void, in spite of our repeated requests for updates about our children's education.

23. Our local school administrators have not answered our questions. Instead, they have referred us to the DoDEA Americas Public Affairs Officer (PAO). Rather than provide us with new information, however, the PAO has merely rehashed and paraphrased Dr. Schiavano-

Narvaez's February 10 letter. When we pressed for more, the PAO referred us to the DoDEA Civil Rights Division. Ms. Taylor York, the DoDEA Civil Rights Program Manager, told us the DoDEA was not obligated to allow parents full access to library holdings or listings until December 22, 2025, citing the timelines identified in the FY2024 National Defense Authorization Act. A true and correct copy of email communications with Quantico CES administrators, DoDEA NY/VA Superintendent, DoDEA Americas PAO, and DoDEA Civil Rights Program and Compliance Branch is attached as **Exhibit D**.

24. At every turn, when we sought specific information about the changes impacting our children's school, we were referred back to the verbiage in the Executive Orders. We were also told to submit FOIA requests to obtain information. Because we had anticipated it would be difficult to get information, my husband had already started this process, sending an initial FOIA request on February 11, 2025 (#25-F-00107). The February 11 FOIA requested lists of all books removed from my children's school as of that date, as well as written records or minutes documenting the work of the DoDEA curriculum and instruction team that decided on the list for removal. As of the date of this declaration, the status of our February 11 FOIA is still listed as "Assigned for Processing." The FOIA Office provided an interim response on April 18, 2025, estimating a fulfillment date of 18 May—more than 90 calendar days after submission. *See Exhibit E*.

25. Since the February 11 FOIA, my husband has filed five more FOIA requests. Of these six total requests, only two have been even partially fulfilled. Because I am familiar with the FOIA Statute and 10 U.S.C. § 2164a, I expected DoDEA to fulfill our FOIA requests.

26. At this point, we have attempted and exhausted every administrative recourse available to us in an attempt to get basic information about our children's education. Yet still, we

have not received a satisfactory answer to the simple question: “What books are being removed from my children’s school library?”

27. What we do know, based on the little information provided to us, is that our children’s school curriculum has changed. For example, our older daughter (E.K.) is in fourth grade, and DoDEA has directed certain readings, including one titled, “A Nation of Immigrants,” to be removed from DoDEA schools’ fourth grade curricula. The only reason given for removing these materials is compliance with the Executive Orders.

28. I looked for, and did not find, any prior notification of this change to the curriculum or of Crossroads’ academic standards, on the DoDEA website or elsewhere, although as a keenly interested parent, I know such notification is required by 10 U.S.C. § 2164a. The impact on E.K. is immediate because she cannot access the reading at school during the compliance review period. With the school year nearing an end, she has forever lost the opportunity to learn about the text in an educational setting as part of her fourth-grade curriculum.

29. E.K., herself, noticed changes at her school and expressed her concern. In prior years, Crossroads has commemorated Black History Month by teaching about prominent Black figures and placing displays in the library for the entire month of February. Crossroads has also recognized March as Women’s History Month in prior years by teaching about the women’s rights movement and placing displays of historically significant women throughout the school.

30. This year, however, partway through February, E.K. noticed that the Black History Month displays had been taken down and that her school was no longer teaching about the history of Black people in the United States or even acknowledging February as Black History Month. This disappointed and upset E.K. because she has always enjoyed learning about historically and

culturally significant art, literature, and events associated with the Black community during the school year.

31. E.K. also noticed that Crossroads did not acknowledge March as Women's History Month. As a mother of two young girls, I find this change incredibly alarming. I fear that the school is telling my children that the accomplishments of women no longer matter or that there is something wrong, or discriminatory, with celebrating achievements made by women throughout history, even in the face of adversity.

32. In the past, Crossroads provided my children with the opportunity to learn about culturally inclusive topics in an academic setting that included meaningful discussions with teachers and classmates. As a parent, I cannot replicate this type of academic environment at home, so it is important that I ensure my children are afforded the opportunity to benefit from a culturally rich curriculum in school. Now, however, both my children are being denied opportunities to learn about the history and culture of marginalized groups from teachers who are trained to help students from a variety of backgrounds understand the people and world around them.

33. While our children have noticed some changes in school, officials have refused to tell us what specific modifications have been implemented. Although DoDEA has directed certain readings to be removed from grade-level curricula, DoDEA has also mandated educators and school leaders to identify additional materials for removal and compliance review. This means that I still cannot answer with certainty E.K.'s repeated question, "What books have they removed?" from her favorite place in school—the library.

34. I have tried to determine which books have been removed from DoDEA schools because it is important for me to know what is included—or excluded—from my children's curricula. I have seen social media and anonymous online postings indicating which books and

other materials have been removed from DoDEA schools for “review” across various locations. Based on my review of these lists, it appears dozens of titles have been removed from DoDEA schools all over the world.

35. Changes to DoDEA school curricula under the Executive Orders and guidance are also not being applied evenly. As an example, Dr. Schiavano-Narvaez’s February 10 letter indicated that all cultural heritage months would be cancelled. Crossroads took down its Black History Month display in February and did not commemorate Women’s History Month in March. During those same months, however, Crossroads devoted resources (class time and spaces) to commemorate Valentine’s Day, St. Patrick’s Day, and Easter. No such commemoration was held for other culturally significant holidays such as Ramadan and Eid al-Fitr, although these also occurred during recent weeks. Similarly, Lunar New Year, which was commemorated in 2024, was not marked this year—a difference that even our first grader, S.K., commented on.

36. This has led me to believe that DoDEA schools are allowed to acknowledge some culturally significant days or months (ones with Christian significance) while restricting others. I do not want my children to be at a school that deprioritizes marginalized cultures. These actions, however, are entirely consistent with Secretary Hegseth’s criticism of “Cultural Marxist” influences and his promotion of “Western Christian” culture.¹

37. My family and I have also noticed and discussed that the DoDEA removal lists include subjects and materials relating to gender. I understand this to be an attempt to comply with Executive Order 14168, which states that “sex” is an “immutable” classification based on a “biological classification as either male or female” not a person’s “gender identity.” (See EO 14168 Sec. 2(a).)

¹ Battle for the American Mind, pp. 172-174, 217, Chapter 11 entire, in reference to what he calls the “Western Christian Paideia” versus the “Cultural Marxist Paideia.”

38. From my training and work as a healthcare professional, I understand that scientific research supports the conclusion that a person's gender identity is separate (and sometimes different) from a person's biological sex assigned at birth. Erasing the entire dimension of gender contradicts established science and adopts non-scientific ideology as "truth." My profession is based on science, and ignoring science in favor of ideology would lead to disastrous outcomes for my patients. Because of my own educational and professional experience, it is extremely important to me that my children's education be grounded in science and the scientific method. A school system that is divorced from scientific reality is not the kind of school system that I want for my children.

39. This attempted deletion of gender identity also runs counter to my children's direct experience. E.K. and S.K. both know a number of queer or gender non-conforming people. We have sought to raise our children to be open to, and accepting of, diversity across the range of human experience, and this ideologically motivated push to erase diversity within the school environment is entirely at odds with those goals.

40. No justification has been provided for these changes at my children's school other than the Executive Orders and related DoDEA directives. At no point has DoDEA conveyed that the removed books or curriculum materials were inaccurate or age-inappropriate, and the established procedures for book challenges and removal have not been applied. Nor has DoDEA said that the removals are based on pedagogical evidence of any kind. Despite Executive Order 13985's stated aim of "ending radical indoctrination," the effect of the Executive Orders and DoDEA directives has been to deny E.K. and S.K. access to diverse viewpoints in what feels like an attempt to indoctrinate my children with an un-scientific and ahistorical set of ideas.

41. The changes to the curricula in DoDEA schools have been done in haste and behind closed doors, and officials have provided no pedagogical reason for the modifications. Based on our family's experience, the changes have resulted in applied academic standards being replaced with ideological screenings, and I fear that my E.K. and S.K. can no longer obtain the type of independent, well-rounded education to which they are entitled.

42. I do not want my children educated in a school system that substitutes ideology for science, history, and current events. This approach will not make our children more competitive in the workplace, in research, or in academia. Removing the cultural context of historical events or teaching that it is un-American merely to observe that America's founding documents are racist and sexist² is similarly counter-factual and blinds our children to the various forces that have shaped our country and global society throughout history, and into the present moment.

43. These actions are rapidly destroying the positive experience that we have enjoyed at DoDEA. Our society already asks for tremendous sacrifices from the families of uniformed servicemembers—asking us to also give up on a quality education for our children is a sacrifice that we should never have to make.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 4, 2025.



Lindsey Keeley

² EO 14185, Restoring America's Fighting Force. Obviously, if the Constitution had been neither racist nor sexist there would have been no need for the 13th, 15th, 19th or 24th Amendments.

EXHIBIT A



DEPARTMENT OF DEFENSE EDUCATION ACTIVITY
HEADQUARTERS
4800 MARK CENTER DRIVE
ALEXANDRIA, VA 22350-1400

February 5, 2025

MEMORANDUM FOR DODEA DIRECTORS FOR STUDENT EXCELLENCE
DODEA CHIEFS OF INSTRUCTIONAL LEADERSHIP DEVELOPMENT
DODEA DISTRICT SUPERINTENDENTS
DODEA COMMUNITY SUPERINTENDENTS
DODEA INSTRUCTIONAL SYSTEMS SPECIALISTS
DODEA REGION CHIEFS OF STAFF
DODEA PRINCIPALS
DODEA ASSISTANT PRINCIPALS
DODEA EDUCATORS

SUBJECT: Administrative Operational Compliance Review of *DoDEA Adopted Instructional Resources*
Related to Gender and/or Discriminatory Equity Ideology Topics

To comply with the recent Executive Orders titled "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government" and "Ending Radical Indoctrination in K-12 Schooling," DoDEA is conducting an operational compliance review to ensure alignment with the applicable Executive Orders. As part of this review, *DoDEA adopted instructional resources* potentially related to gender ideology or discriminatory equity ideology topics, as defined in the Executive Orders, should not be utilized for instruction. Specific resources identified are in Attachment A. A small number of links to external resources have been deactivated, but this should not impact routine use of adopted resources for educators. Educators are expected to implement this directive immediately. Principals must ensure that educators are aware of and comply with this instruction. If educators or school leaders have a question about use of a specific resource not listed in Attachment A, please notify your district ISS with the specific resource. District ISS should then share that information with their HQ ISS counterpart to be added to the compliance review and notice will be provided if use of an instructional resource should be discontinued.

We will provide further guidance upon receipt of official instructions. As a federal agency, we are committed to compliance with the Executive Orders and will ensure our policies and practices align accordingly.

For general questions about this guidance, not inquiries about specific resources, please contact (b)(6) Acting Chief of Curriculum and Instruction at (b)(6)@dodea.edu or (b)(6) HQ Elementary Content Program Manager at (b)(6)@dodea.edu.

(b)(6)

Acting Chief Academic Officer

Attachment:
As stated

cc:
President, ACEA
President, FEA
Director, FEA-SR
President, OFT

Attachment A

The following list includes selected instructional resources that should not be used by DoDEA educators during the operational compliance review.

AP Psychology			
Company	Resource/Grade	Course	Do not use this resource
College Board	AP Psychology	AP Psychology	Please exclude “gender identity” from learning objective 3.6.A.8 and excluding Module 32 Gender and Sex
McGraw Hill	AP Psychology	AP Psychology	Chapter 11 – Sexuality and Gender
Elementary Social Studies			
Company	Resource/Grade	Course	Do not use this resource
TCI	Biographies K-5	Elementary SS Grade K-5	Albert Cashier, Civil War Veteran
TCI	G5 Western Hemisphere; Lesson 7: Migration to the United States Impact on People and Places	Elementary SS Grade 5	Section 4 Reading - How Does Immigration Affect the U.S.?
TCI	G4 Lesson 3: The Peopling of the United States	Elementary SS Grade 4	Explore Reading - A Nation of Immigrants
Secondary ELA			
Company	Resource/Grade	Course	Do not use this resource
HMH	READ 180	Strategic Literacy 6-12	Independent Reading Novel - Becoming Nicole
Secondary Health			
Company	Resource/Grade	Course	Do not use this resource
G-W	6 th through 8 th grade Health	Comprehensive Health Skills for Middle School	Comprehensive Health Skills for Middle School Chapter 18.1
Secondary Social Studies			
Company	Resource/Grade	Course	Do not use this resource
HMH ED	Grade 6: My Friend in Learning	6 th Grade Eastern World	My Friend in Learning Professional Learning. New for You Seasonal Bundle: Black History Month 2025



**DEPARTMENT OF DEFENSE EDUCATION ACTIVITY
EUROPE
UNIT 29649
APO AE 09136-9649**

7 Feb 25

TO: DoDEA Europe Administrators and School-level Employees

To ensure compliance with executive orders and recent DoD guidance, the following must be adhered to:

We will not be holding cultural observances pending further guidance

As a guide, all planned special activities and non-instructional events related to the former monthly cultural awareness observances will not be held pending further guidance. No man-hours or government resources are authorized for the planning, preparation, or execution of such activities or events currently. All internal and external communication platforms including but not limited to school social media accounts and websites, should refrain from disseminating information regarding the former monthly cultural awareness observances.

Host Nation language and culture classes, international exchanges, and the like, are permitted to continue as scheduled.

School administrators should communicate that prohibited events which have been planned already are currently cancelled pending further guidance from the DoD

Review email signature blocks

Email signature blocks must not include self-identified pronouns and should not include quotes, sayings, or mottos.

Review and revise locally created documents

School-level documents requesting student information must use the term "sex" not "gender." Ensure available responses are "male" or "female" only, without reference to gender. This also applies to informal forms and personal data collection created by an educator, counselor, nurse, coach, or other staff.

Ensure compliance of school facilities, programs, and activities

All facilities, programs, and activities designated as for girls may only be accessed by biological females and all facilities, programs, and activities designated as for boys may only be accessed by biological males. This includes athletic activities. A student's sex is the sex recorded in his/her official school record.

Assess signage

Any signage supporting the inculcation or promotion of gender ideology must be removed. Signage for shared intimate spaces, such as restrooms and locker rooms, shall use the terms "women,"

“woman,” “girls,” “girl,” “men,” “man,” “boys” or “boy.” Single-user unisex facilities remain available to anyone of either sex.

Curriculum, policies, databases, contracts

Curriculum guidance for classroom instruction related to gender ideology and discriminatory equity ideology has been issued identifying selected instructional resources that should not be used by DoDEA educators during the operational compliance review.

Continue teaching to standards with DoDEA adopted resources, except for the resources potentially related to gender ideology and discriminatory equity ideology that are under the operational compliance review.

Information Specialists must ensure books potentially related to gender ideology or discriminatory equity ideology are removed from the student section of the Information Center and placed in the professional collection. Specific instructions for removing books will be provided to school administrators.

Key personnel at DoDEA Headquarters are addressing compliance actions that apply activity-wide, such as modifications to official DoDEA policy, forms, document, electronic communication and database systems, contracts, curriculum and any additional items that originate out of Headquarters.

Counseling Services

If a student is experiencing emotional/psychological distress at school related to being recognized by their biological sex, he/she continues to be equally entitled to the same mental health services as are made available to any other student who is experiencing emotional/psychological distress at school for whatever reason. The counseling support provided, however, must remain objective and neutral in its application without taking action that would unlawfully facilitate the gender transition of a minor student.

Thank you for your support as we implement these new DoD guidelines.

(b)(3):10 U.S.C. §130b; (b)(6)

Chief of Staff

Page 5

Withheld pursuant to exemption

(b)(5); (b)(6)

of the Freedom of Information and Privacy Act

Page 6

Withheld pursuant to exemption

(b)(5); (b)(6)

of the Freedom of Information and Privacy Act

EXHIBIT B



DEPARTMENT OF DEFENSE EDUCATION ACTIVITY
HEADQUARTERS
4800 MARK CENTER DRIVE
ALEXANDRIA, VA 22350-1400

FEB 10 2025

DoDEA Sponsors, Parents, and Guardians,

In light of the President's recent Executive Orders titled "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government" and "Ending Radical Indoctrination in K-12 Schooling," DoDEA is conducting an operational compliance review to ensure alignment with the Executive Orders.

As part of this review, DoDEA-adopted instructional resources and Information Center (library) books potentially related to gender ideology or discriminatory equity ideology topics were examined. DoDEA's curriculum and instruction team, referencing terms and definitions in the above Executive Orders, identified a small number of items for further review. Information Center books identified for review will be relocated to the professional collection for evaluation with access limited to professional staff.

On January 31, 2025, the Secretary of Defense issued guidance to all Department of Defense (DoD) components and Military Departments prohibiting the use of official resources to host celebrations or events related to cultural awareness months. As a DoD entity, DoDEA is fully complying with that guidance.

We are working through the Executive Orders at DoDEA headquarters to determine required actions for DoDEA schools and providing guidance, as appropriate, to ensure there are consistent policies and practices in place that comply with current Executive Orders and DoD guidance. We are continuing to work with Region, District, and school leadership during this process. I am in constant contact with our region leadership to ensure appropriate implementation throughout the Activity.

DoDEA is committed to its core mission in support of the Warfighter – providing a top tier education to our military-connected students. We at DoDEA are honored to serve more than 67,000 students, and their families, and in so doing play an important role in supporting our country's military readiness.

The strength of our DoDEA community lies in its people – students, educators, and families. We remain committed to fostering a learning environment where every student feels valued, supported, and empowered to succeed in a dynamic world.

Sincerely,

A handwritten signature in black ink, reading "Beth Schiavino-Narvaez", is positioned above the printed name.

Beth Schiavino-Narvaez, Ed.D.
Director

EXHIBIT C



**DEPARTMENT OF DEFENSE EDUCATION ACTIVITY
AMERICAS**

**MID-ATLANTIC DISTRICT, QUANTICO FIELD OFFICE
3308 JOHN QUICK ROAD
QUANTICO, VA 22134
703.630.7012**

February 20, 2025

MEMORANDUM FOR RECORD

SUBJECT: Minutes for the Quantico School Board Meeting of February 20, 2025

1. **Call to Order:** The Quantico School Board meeting was called to order by Vice President, Mrs. Soucie, February 20, 2025 at 1:33 PM at the Crossroads ES Commons Area.
2. **Members Present were:**
Denise Eves, School Board Clerk
Alexis Soucie, School Board Member Vice President
Amy Rosalez, Board Member
Amanda Willmoth, Board Member
Ashley Lockridge, Board Member
Anne Hickey, Board Member
Austin Porter, Board Member
Dr. Vickie Bannerman, NYVA Community Superintendent

Others Present:

Ben Kolodziej, Interim Crossroads Principal Miles Shea, QMHS Principal
Dr. Lynsee Lee, Assistant Principal, CES
Newly elected school board members were sworn in by Dr. Bannerman.

1. **Approval of Agenda:** Approved agenda
2. **Approval of Past Minutes:** Approved minutes change to November 2024.
3. **School Liaison Report:** given by Penny Rowley

School liaison is partnering with schools to provide bullying education and bring assemblies to the schools to educate the students.

PEA Report: No PEA member was present

4. **School/Updates/Presentations:**

CrossroadsES: given by Ben Kolodziej and Lynsey Lee

Kindergarten students sang to the board and those in attendance.
Mr. Shea has been picked as the Principal of the Year for Americas.
Introduced Dr. Lynsee Lee as the new Assistant Principal for CES.
Enrollment: 610
Current vacancies
Book Fair
Read across America
Fun Run over \$20,000 for PEA.
NEAP testing
New Principal will arrive in March, Dr. Mannie

Quantico MHS given by Miles Shea

Thanked Dr. Lee and Mr. Kolodziej for supporting both schools.

Enrollment: 288

Activities include the Marine Corps Ball

White House tour

Athletics: great winter sport program

Door decorating contest

Winter Concert

NAEP: selection of students were tested.

April 30th to take possession of the building. DODEA is required to occupy the new school within 90 days, and the plan is for teachers to move during the summer. Pictures were shown.

5. **Board President Comments:**

Board Vice President thanked parents for being there, emphasized their support and highlighted that we are all a team. Encouraged parents to continue to voice concerns, and ask questions. If we do not know, we cannot help. Nice to have the parents in attendance for the meeting. School board email will be provided to schools and school liaison to share with parents as a means for them to express their concerns and have the board address them.

6. **Community Superintendent comments:**

Pilot program:

Dr. Bannerman shared that approval for Pilot program expansion. DODEA HQ is working on a fair way to allow families living off base to have their children attend Quantico schools. At this time she does not know when the details will be finalized, or applications will open. The application process is still being worked out. More to come. Dr. Bannerman explained what the Pilot Program is.

Parent Monbeck: asked a question concerning the already short staffed schools and challenges complying with IEP's. Asked how many teachers will be added to the team? Dr Bannerman stated that was part of the ongoing discussion.

7. **Continuous Business:**

Dr. Bannerman shared that at this time actions taken in compliance with the EO: an OSHA poster was removed, books have been removed from the school libraries. Dr. Bannerman stated that the gender recognition forms have to be updated. Restrooms are girls/boys, teachers were told to remove pronouns from their signatures. Athletics: male/females. Diversity (DEI) posters, and celebrations have been removed.

Vice president asked why the differences between QMHS and Crossroads in removal of books from the library (QMHS has removed 10 so far, Crossroads zero). Mr. Kolodziej stated the librarian completed a training, and they were still working through what the actions required are. Dr. Bannerman would work to get a list of removed books to parents, if allowed by DODEA HQ.

8. **New Business:**

9. **Individuals Wishing to Address the Board: Letter from Director. C**

Lt. Col Keely asked what the impact from the EO has been to the schools, what is being done and will need to be. Specifically changes in curriculum, impact on activities (Black history month, women's history month etc). Dr. Bannerman stated that all requirements and changes are coming from DODEA HQ. Principal don't have the information, and at this time no one has the information. She also shared that DODEA employees have been informed they are not to respond

to media requests. DODEA HQ is working with the executive order. All guidance will come directly from DODEA HQ. We are a federal agency. Dr Bannerman has been told regarding the curriculum, is that teachers are to continue using the approved curriculum. It is inclusive and they are following the standards. At this time DODEA cannot highlight and celebrate cultural things.

Follow-up question: How does it affect us? Dr. Bannerman stated it's however HQ tells us.

International parent asked: Concerned about communication and as a new family how is the communication passed about changes and updates.

Dr. Bannerman responded that communication will be pushed, when they receive it and are told they can share it.

Parent: Capt Haskey stated that a few unfortunate incidents have come to his attention: These are concerns from Crossroads staff members expressing their concerns to his wife. They include CES staff members not receiving a duty-free lunch break. Staff members being Inappropriately touched by a student, on more than one occasion. His wife has been threatened that a student was going to shoot her, administration at CES was informed along with his command.

Dr. Bannerman stated she appreciated him sharing his concerns, that this is the first she was hearing of these issues. She asked him to either email her or speak with her after so they could gather further information.

Woods: CES parent expressed concerns about her child having a LTS in the classroom, and not receiving information about what students are learning, or if there are concerns. Parent expressed that she has no clue what is being taught in class. 2nd grade.

Mr. Kolodziej acknowledges what the parent was saying, and agreed communication could have been better. He shared that there will be a certified teacher on Monday for the 2nd grade.

Vice president asked if moving forward perhaps information about changes in teachers could be shared with parents before changes occurred.

Kindergarten parent: shared concerns about no communication with the teachers. She is hearing from others that there are concerns about her student in class, but she is not hearing from teachers. Is not aware of how the student is doing. Mr. K again expressed that communication should be better. That report cards are coming out. Vice president asked about progress reports, don't these come out quarterly?

Dr. Bannerman stated that we need to have reasonable expectations of our teachers. It's a lot for the teachers to communicate weekly and send out information. But she will discuss with the principals and come to a solution.

10. **Announcement of Next Meeting:** The next school board meeting will be held on March 13th at Quantico MHS Media Center at 11:30 AM.

1. **Adjournment.** Vice President motioned to adjourn the meeting. The Quantico School Board meeting was adjourned at 3:00 PM.

Respectfully submitted,

Dr. Vickie Bannerman
NYVA Community Superintendent

Marta Sullivan
School Board President

EXHIBIT D



Paul Keeley <keeley1@gmail.com>

Clarification on withdrawn books?

York, Taylor Ms. CIV OSD/DoDEA-HQ <Taylor.York@dodea.edu>

Tue, Mar 4, 2025 at 11:19 AM

To: Paul Keeley <keeley1@gmail.com>, "Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas"

<Pamela.Westbrook@dodea.edu>, "Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas" <Lynsey.Lee@dodea.edu>, "Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas" <Benjamin.Kolodziej@dodea.edu>

Cc: "O'day, Michael Mr. CIV OSD/DoDEA-Americas" <Michael.Oday@dodea.edu>, DoDEA Americas Supt NY/VA <DoDEAAmericaSuptNY/VA@dodea.edu>, "Lindsey N. Keeley" <lindseykeeley44@gmail.com>, Americas PAO <americaspao@dodea.edu>

Dear Paul Keeley,

Please note the exceptions in Section 589 subsection (c) of the National Defense Authorization Act of FY 2024 that make clear certain rights enumerated are not in effect until two years after the effective date of the NDAA FY2024. The effective date is December 22, 2023, so the following provisions are not effective until December 22, 2025:

“(c) EXCEPTIONS.—

- 1. Paragraph (5) of subsection (a) and paragraph (3) of subsection (b) shall not be effective until the day that is two years after** the date of the enactment of the National Defense Authorization Act for Fiscal Year 2024.

Paragraph (5) of subsection (a) reads: “(a) IN GENERAL.—The parent of a child who attends a school operated by the Department of Defense Education Activity has the following rights...(5) The right to inspect a list of the books and other reading materials contained in the library of the school.”****

Paragraph (3) of subsection (b) reads: “(3) provide parents access to the online school library catalog;**”**

As for your remaining requests, please note that disclosure of anything listed in subsection (b) must first be weighed against any Federal laws or regulation that would make the disclosure unlawful.

“(c) EXCEPTIONS.—

- (2) A requirement set forth in subsection (b) shall not apply in a case in which the requirement would violate any applicable provision of a Federal or State statute or regulation.**

Adhering to the restrictions in section (c)(2) that may apply to the release of records is what the FOIA process exists to address. Through the FOIA process, what you are entitled to by law will be provided to you, in accordance with applicable law.

Yours truly,

Taylor York, LLM, CCEP (Ms.)

Civil Rights Analyst and Program Manager

Civil Rights Program and Compliance Branch

DoD Education Activity

PRIVACY ACT PROTECTED: Any misuse or unauthorized disclosure of this information may result in both civil and criminal penalties. If you have received this correspondence in error, please notify the sender at once and destroy any copies.

From: Americas PAO <americaspao@dodea.edu>

Sent: Tuesday, March 4, 2025 9:39 AM

To: Paul Keeley <keeley1@gmail.com>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas <Pamela.Westbrook@DODEA.EDU>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas <Benjamin.Kolodziej@DODEA.EDU>

Cc: O'day, Michael Mr. CIV OSD/DoDEA-Americas <Michael.Oday@dodea.edu>; Americas PAO <americaspao@dodea.edu>; DoDEA Americas Supt NY/VA <DoDEAAmericaSuptNY/VA@DODEA.EDU>; Civil Rights (HQ) <Civil.Rights@DODEA.EDU>; Lindsey N. Keeley <lindseykeeley44@gmail.com>

Subject: RE: Clarification on withdrawn books?

Good morning LtCol,

As noted in the DoDEA CRP guidance below, any request for such records, including a list of library books or reading materials, must be submitted through the official DoDEA FOIA process. You can find detailed information on how to submit a request, along with the necessary forms, on the DoDEA website at: <https://www.dodea.edu/offices/executive-services/freedom-information-act-foia>.

Once your request is submitted, the FOIA office will process it in accordance with federal guidelines and provide you with the information you're seeking.

v/r

Michael

Michael O'Day

Americas Communications Director

Department of Defense Education Activity

700 Westpark Drive Peachtree City, GA 30269

(706) 715-9683

Media Inquiries: AmericasPAO@dodea.edu

DVIDS - Department of Defense Education Activity Americas

"Fostering Understanding One Story at a Time!"

From: Paul Keeley

Sent: Tuesday, March 4, 2025 8:24 AM

To: Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas ; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas ; Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas

Cc: O'day, Michael Mr. CIV OSD/DoDEA-Americas ; Americas PAO ; DoDEA Americas Supt NY/VA ; Civil Rights (HQ) ; Lindsey N. Keeley

Subject: Re: Clarification on withdrawn books?

This message originated from outside of DoDEA.

Good morning Crossroads team. As I understand from the various emails I have received (below), books under review are being held in the professional section and have not been removed from the library. Please let me know how I can access a listing of the holdings within the professional section, or let me know a good time to come review the holdings in person.

As stated in the Code of Federal Regulations, Title 10, Section 2164a, parents of DoDEA children have:

(5) The right to inspect a list of the books and other reading materials contained in the library of the school

Since I've been told that these materials have not been removed, and the law does not differentiate between student/professional holdings, I would like to exercise my right to inspect the list of ALL books and reading materials contained in the library of the school. I have extensively searched through the online library listings since receiving the below reply, and have noted a number of materials are no longer listed which I have good reason to believe were previously listed, hence my request.

Thanks,

Paul Keeley

On Feb 27, 2025, at 5:53 AM, Civil Rights (HQ) <Civil.Rights@dodea.edu> wrote:

Greetings, Paul Keeley.

You have reached the DoDEA Civil Right Program and Compliance (CRPC) Branch.

The DoDEA CRPC Branch is an independent and impartial office within DoDEA that has exclusive authority to accept and guide through to final resolution formal written reports alleging Executive Order 13160 (EO 13160) discrimination in DoDEA operations. EO 13160 specifically mandates that, *"No individual, on the basis of race, sex, color, national origin, disability, religion, age, sexual orientation, or status as a parent, shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination in, a Federally conducted education or training program or activity."*

DoDEA is committed to supporting a higher quality learning and work experience for its students, employees, and other participants through enforcement of protections against unlawful discrimination aimed at ensuring equal treatment of and appreciation for the value added by each unique individual. You may visit the DoDEA CRP website at <https://www.dodea.edu/offices/civil-rights-program> to learn more about the types of discrimination protected against under EO 13160.

Regarding your concerns raised, below, DoDEA is required to operate lawfully in compliance with Federal laws, Executive Orders, regulations and DoD policy. If any such authority is changed or modified, it is not a wholesale denial of rights to pause operations and/or access to resources pending a thorough review to ensure DoDEA may maintain its lawfully compliant operations. Taking steps to equalize programs or policies that did not treat all people and students equally in their diversity but provided more favorable treatment to one group based on their protected class, alone, is not a denial of rights but a reallocation of equal treatment guarantees.

Regarding Black History Month, the Secretary of Defense ordered a change within DoD impacting the past practice of how Special Emphasis Months may be observed. The DoD has directed that DoD, its components and Activities, of which DoDEA is included, *"will not use official resources, to include man-hours, to host celebrations or events related to cultural awareness months, including National African American/Black History Month, Women's History Month, Asian American and Pacific Islander Heritage Month, Pride Month, National Hispanic Heritage Month, National Disability Employment Awareness Month, and National American Indian Heritage Month. Service members and civilians remain permitted to attend these events in an unofficial capacity outside of duty hours."* The DoD seeks to celebrate the valor and success of heroes of all races, genders, and backgrounds, equally, and not put people into separate boxes. Since our schools support families of active military and military connected personnel, DoDEA schools are part of this less restricted approach to honoring and celebrating people whose accomplishments serve the greater good. Instruction may now focus on the character of the diverse people we admire and do it anytime of the year, not just for one month a year.

Requests for what guidance was provided, what books are included in the review, what criteria is being used, what is the timeline, what curriculum changes will be made, etc., are all related to business operations and are, thus, business records. As a Federal agency, DoDEA's business records are governed under the Freedom of Information Act (FOIA). Federal employees are not free to release business records at will. Any requests for business records must be submitted through the DoDEA FOIA process, located at <https://www.dodea.edu/offices/executive-services/freedom-information-act-foia>.

Yours truly,

Civil Rights Program and Compliance Branch

DoD Education Activity

4800 Mark Center Drive

Alexandria, VA 22350

PRIVACY ACT PROTECTED: Any misuse or unauthorized disclosure of this information may result in both civil and criminal penalties. If you have received this correspondence in error, please notify the sender at once and destroy any copies.

From: O'day, Michael Mr. CIV OSD/DoDEA-Americas <Michael.Oday@dodea.edu>

Sent: Wednesday, February 26, 2025 11:13 PM

To: Paul Keeley <keeley1@gmail.com>; Civil Rights (HQ) <Civil.Rights@DODEA.EDU>

Cc: Americas PAO <americaspao@dodea.edu>; DoDEA Americas Supt NY/VA <DoDEAAmericaSuptNY/VA@DODEA.EDU>; Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas <Benjamin.Kolodziej@DODEA.EDU>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas <Pamela.Westbrook@DODEA.EDU>

Subject: Re: Clarification on withdrawn books?

LtCol,

Please contact the DoDEA Civil Rights Program at Civil.Rights@dodea.edu with any further questions on this topic.

v/r

Michael

Michael O'Day
Americas Communications Director
Department of Defense Education Activity
700 Westpark Drive Peachtree City, GA 30269
(706) 715-9683
Media Inquiries: AmericasPAO@dodea.edu

DVIDS - Department of Defense Education Activity Americas
"Fostering Understanding One Story at a Time!"

From: Paul Keeley <keeley1@gmail.com>

Sent: Wednesday, February 26, 2025 10:33:28 PM

To: O'day, Michael Mr. CIV OSD/DoDEA-Americas <Michael.Oday@dodea.edu>; Civil Rights (HQ) <Civil.Rights@DODEA.EDU>

Cc: Americas PAO <americaspao@dodea.edu>; DoDEA Americas Supt NY/VA <DoDEAAmericaSuptNY/VA@DODEA.EDU>; Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas <Benjamin.Kolodziej@DODEA.EDU>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas

<Pamela.Westbrook@DODEA.EDU>

Subject: Re: Clarification on withdrawn books?

This message originated from outside of DoDEA.

Thank you for your note and the additional contact. I have two additional questions based on this response--perhaps the Civil Rights Program can clarify. As noted before, I am requesting this information in my personal capacity as a parent of two children within DoDEA schools.

First, is it the position of DoDEA that the Letter to Parents dated 10 February fulfills the statutory requirement contained in 10 USC Sec 2164a to notify parents of an alteration of academic standards?

Second, in light of Mr. O'Day's statement that "no books have been permanently removed," can you please provide the expected length of time wherein these books will be inaccessible to the students? Timelines matter--for example, if the resources listed for the 4th grade are not returned to use before the end of the school year, then my oldest--PII [REDACTED]--will not receive that block of instruction per the current approved DoDEA curriculum. Likewise, Black History Month ends in two days; even if the 6th Grade module on Black History Month were returned to the classroom by next Monday, it will have effectively been removed for the entire 6th grade for this academic year.

I also understand from this response that the online school library catalog will contain all books within the school library and thus (as of today) will reflect that no books have been removed at the present time. Access to their children's school catalog by a parent, again, is guaranteed by 10 USC Sec 2164a and I therefore expect that my local DoDEA school will have no issues providing me access to that full listing without further permission from DoDEA HQ.

Thank you for your consideration.

-Paul Keeley

keeley1@gmail.com

PII [REDACTED] (cell / Signal)

On Wed, Feb 26, 2025 at 7:42 AM O'day, Michael Mr. CIV OSD/DoDEA-Americas
<Michael.Oday@dodea.edu> wrote:

LtCol,

Thank you for reaching out.

As a field activity of the Office of the Secretary of Defense, I can assure you that we are in compliance with all applicable executive orders and Department of Defense guidance.

Teaching students about the lives and experiences of people from different backgrounds than their own is part of the high-quality education DoDEA offers. We expect little to no impact on our students while ensuring each learner receives appropriate direction to excel at their own pace and in their own

way.

No materials have been permanently removed from our school libraries pending completion of the review. During this period, materials under review will have access limited to professional staff.

We appreciate your continued support in your child's education.

Please contact the DoDEA Civil Rights Program at Civil.Rights@dodea.edu with any further questions on this topic.

v/r

Michael

Michael O'Day

Americas Communications Director

Department of Defense Education Activity

[700 Westpark Drive Peachtree City, GA 30269](#)

(706) 715-9683

Media Inquiries: AmericasPAO@dodea.edu

[DVIDS - Department of Defense Education Activity Americas](#)

"Fostering Understanding One Story at a Time!"

From: Paul Keeley <keeley1@gmail.com>

Sent: Tuesday, February 25, 2025 10:50 PM

To: Americas PAO <americaspao@dodea.edu>; DoDEA Americas Supt NY/VA VA@DODEA.EDU>

Cc: Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas <Benjamin.Kolodziej@DODEA.EDU>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas <Pamela.Westbrook@DODEA.EDU>

Subject: Re: Clarification on withdrawn books?

This message originated from outside of DoDEA.

Good evening,

I'm writing to follow up on the below request, as well as to address additional questions that I have following the Quantico school board meeting held last week. While I have yet to receive anything through official channels, I am now in possession of the memo dated 5 February (with attachment A) detailing the initial tranche of immediately withdrawn materials--which included both library books as well as curricular materials. I received this from multiple corroborating sources external to the school, to include my congressman's office, media outlets, and other concerned parents from different parts

of the DoDEA system.

I'm trying to reconcile this information with the information provided at the school board meeting, which led me to believe that the existing approved DoDEA curriculum is still being taught. The majority of items in the attachment appear to be from the curriculum, and are neither supplemental materials nor library books. Please clarify if the approved curriculum is still being taught--or, if not, what academic or educational standards led to these changes during the school year.

At the meeting we were told that our school librarian received a day of training prior to beginning a further review of holdings at Crossroads Elementary School. I am following up my verbal request that the training materials used be provided to parents--as well as the academic or educational standards that this review is founded upon.

I was also subsequently informed that a representative from DoDEA HQ will be inspecting/verifying compliance at Quantico DoDEA schools, to include final determination of what additional materials will be removed from the library. Can you please confirm or deny this; if correct, when will this inspection take place? I'd also request that parents (or at minimum school board members, or the MCCA School Liaison) be allowed to observe this inspection.

Finally, when will the consolidated list of removed materials & curriculum changes across DoDEA be provided to parents?

Thanks,

-Paul Keeley

keeley1@gmail.com

Cell/Signal: PII

On Sat, Feb 15, 2025 at 10:24 AM Paul Keeley <keeley1@gmail.com> wrote:

OK, just so that I understand correctly—you either do not have, or are not authorized to provide this list to parents?

Thanks,

Paul Keeley

Sent from my iPhone

On Feb 15, 2025, at 12:39 AM, Americas PAO <americaspao@dodea.edu> wrote:

LtCol,

I understand, and as a field activity of the Office of the Secretary of Defense, I can assure you that we are in compliance with all applicable executive orders and guidance.

Please let me know if there is anything else I can assist you with.

v/r
Michael

Michael O'Day
Americas Communications Director
Department of Defense Education Activity
700 Westpark Drive Peachtree City, GA 30269
(706) 715-9683
Media Inquiries: AmericasPAO@dodea.edu

[DVIDS - Department of Defense Education Activity Americas](#)
"Fostering Understanding One Story at a Time!"

From: Paul Keeley <keeley1@gmail.com>
Sent: Friday, February 14, 2025 8:56 pm
To: Americas PAO <americaspao@dodea.edu>
Cc: Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas <Benjamin.Kolodziej@DODEA.EDU>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas <Pamela.Westbrook@DODEA.EDU>; Lindsey N. Keeley <lindseykeeley44@gmail.com>; Americas PAO <americaspao@dodea.edu>
Subject: Re: Clarification on withdrawn books?

This message originated from outside of DoDEA.

Michael,

Thanks for your quick response outlining the ongoing policy and resource review at DoDEA.

However, I would still like to know which specific books/resources have been removed from circulation across DoDEA Information Centers/libraries. Dr. Narvaez stated in her letter that "a small number" of books had been pulled for further review; I am simply asking for the titles of these books so that I can be better informed as to the impact of these ongoing changes.

As a parent of two students currently in DoDEA schools, I am hoping to receive a direct answer without having to FOIA my own school system.

Thanks,

-Paul Keeley

On Feb 14, 2025, at 4:35 PM, Americas PAO
<americaspao@dodea.edu> wrote:

Good afternoon LtCol and Mrs. Keeley,

Thank you for reaching out.

DoDEA is reviewing its current policies and instructional resources in light of recent Executive Orders and Department of Defense guidance. Teaching students about the lives and experiences of people from different backgrounds than their own is part of the high-quality education DoDEA offers. However, there are some resources that appear to be in violation of the spirit of recent directives. DoDEA is reviewing its library collections for compliance as part of a larger review.

We anticipate little to no impact on students learning in an academically rigorous environment, continuing to provide the highest quality educational services to all our military-connected students. While ensuring each learner receives appropriate guidance to excel at their own pace and in their own way. We appreciate your continued partnership in your child's education.

v/r
Michael
Michael O'Day
Americas Communications Director
Department of Defense Education Activity
700 Westpark Drive Peachtree City, GA 30269
(706) 715-9683
Media Inquiries: AmericasPAO@dodea.edu

DVIDS - Department of Defense Education Activity Americas
"Fostering Understanding One Story at a Time!"

From: Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas
<Benjamin.Kolodziej@DODEA.EDU>
Sent: Friday, February 14, 2025 4:24 PM
To: Paul Keeley <keeley1@gmail.com>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas <Pamela.Westbrook@DODEA.EDU>
Cc: Lindsey N. Keeley <lindseykeeley44@gmail.com>; Americas PAO <americaspao@dodea.edu>
Subject: RE: Clarification on withdrawn books?

Good Afternoon, LtCol and Mrs. Keeley!

Thank you for your inquiry. All questions regarding DoDEA Information Centers should be directed to AmericasPAO@DoDEA.edu . They are copied on this message.

I hope you enjoy a wonderful holiday weekend and many thanks for your continued partnership!

Ben Kolodziej
Acting Principal
Crossroads ES

From: Paul Keeley <keeley1@gmail.com>
Sent: Tuesday, February 11, 2025 9:27 PM
To: Kolodziej, Benjamin Mr. CIV OSD/DoDEA-Americas <Benjamin.Kolodziej@DODEA.EDU>; Lee, Lynsey Dr. CIV, OSD/DoDEA-Americas <Lynsey.Lee@DODEA.EDU>; Westbrook, Pamela Dr. CIV OSD/DoDEA-Americas <Pamela.Westbrook@DODEA.EDU>
Cc: Lindsey N. Keeley <lindseykeeley44@gmail.com>
Subject: Re: Clarification on withdrawn books?

This message originated from outside of DoDEA.

Hello, just checking to see if there is any further insight you can share on this, and adding in Drs. Lee and Westbrook. As parents of two students at CES PII [REDACTED] we are following up on the message yesterday from Dr. Narvaez notifying us that a number of books have been withdrawn from DoDEA libraries/Information Centers. Can you confirm if this action affects Crossroads, and also provide the specific list of titles that are under consideration? We have not been able to find any further information on DoDEA or Crossroads websites, and would like to know how these new policies will be affecting our childrens' education both at Crossroads and beyond.

Thanks,

-Paul and Lindsey Keeley

On Mon, Feb 10, 2025 at 8:56 PM Paul Keeley <keeley1@gmail.com> wrote:

Good evening,

As parents of two students at CES, we received an email earlier today from DoDEA notifying us that a number of books have been withdrawn from DoDEA libraries. In the interest of transparency for our children's education, can you confirm if this action affects Crossroads, and also provide the specific list of titles?

Thanks,

-Paul and Lindsey Keeley

Sent from my iPhone

EXHIBIT E

Email Details

From:	foia@dodea.edu
To:	keeleyp1@gmail.com
Cc:	
Bcc:	
Subject:	DoDEA FOIA Interim Response to FOIA Request Case Number 25-F-00155
Date Sent:	4/18/2025 10:08:39 AM
Attachments:	
Body:	<p>Dear Paul Keeley:</p> <p>This letter is in regard to your Freedom of Information Act (FOIA) request dated March 04, 2025, which I received March 05, 2025, for a copy of “all submissions, lists, or catalogs of items removed from the student-accessible holdings of any DoDEA library and placed into the professional holdings of any DoDEA library during the course of the Operation Review for compliance described in the Message to Parents from Dr. Narvaez dated 10 February. This request is specifically for all additional items not already included in Attachment A to the DoDEA HQ Memo dated 5 February, and is intended to capture all items identified by educators/school leaders to District ISS, which should have also been shared with HQ ISS for addition to the compliance review. (Date Range for Record Search: From 01/20/2025 To 03/04/2025)”. </p> <p>Your request has been assigned FOIA case number 25-F-00155.</p> <p>We are currently unable to meet the 20-business day suspense. We are currently estimating a completion date of May 18,2025. The Agency is working as quickly as possible to process your request.</p> <p>Please note, you have the right to seek dispute resolution service from the OSD FOIA Public Liaison, Ms. Toni Fuentes at 571-372-0462, email at OSD.FOIALiaison@mail.mil. Additionally, you may contact the Office of Government Information Services (OGIS) to inquire about the FOIA mediation services they offer. The contact information for OGIS is: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769 for any further assistance and to discuss any aspect of your request.</p> <p>If you have any questions, please feel free to contact our office at FOIA@hq.dodea.edu.</p> <p>Sincerely,</p>

Freedom of Information Act/Privacy Act

Requester Service Center